

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10036

ZACHARY GRENDI
(203) 489-1233
zgrendi@zeklaw.com

WWW.ZEKLAW.COM

September 6, 2018

Via ECF
Hon. Judge John. G. Koeltl
United States District Judge
S.D.N.Y.
500 Pearl St.
New York, NY 10007-1312

Re: *Eastern Profit Corporation Limited v. Strategic Vision US LLC*,
Civil Action No. 18-CV-2185

Dear Judge Koeltl,

We represent Eastern Profit Corporation Limited (“Eastern”), plaintiff in the above referenced matter. As Strategic Vision US LLC (“Strategic Vision”) indicated in its Letter Motion to the Court dated August 24, 2018, Eastern does not consent to the proposed amended answer and counterclaim. That said, Eastern has no objection to Strategic Vision’s August 24, 2018 Letter Motion for a conference to discuss the proposed amended answer and counterclaim, and invites such a conference, be it by telephone or in-person.

Eastern respectfully requests that the Court not waive its pre-motion conference requirement. Strategic Vision’s request to add Guo Wengui as a party to this action raises several issues, foremost of which would be Guo Wengui’s right to respond the proposed amended answer and counterclaim of his own accord. A conference would be a productive forum for the parties and the Court to tackle the implications of Strategic Vision’s proposed amended answer and counterclaim.

Respectfully Submitted,

By: /s/Zachary Grendi
Zachary Grendi, Esq.
Zeichner Ellman & Krause LLP
1211 Ave of the Americas
New York, NY 10036
Telephone: (203)489-1233
Facsimile: (203)862-9889